Remarks

This application has been reviewed in light of the Office Action dated September 11, 2007. In view of the foregoing amendments and the following remarks, favorable reconsideration and withdrawal of the rejections set forth in the Office Action are respectfully requested.

Claims 1-3, 7-21, 23-25, 29-43, 45, 46, 48-57, 49-58, and 60-66 are pending, of which Claims 1, 23, 45 and 60 are independent. Claims 4, 6, 26, 28, and 47 have been canceled. Claims 1, 7, 23, 29, 45, 50, and 60 have been amended to incorporate subject matter previously recited in dependent claims. Therefore, no new matter has been added.

Claims 1, 4, 8-13, 19, 20, 23, 26, 30-35, 41, 42, 45, 51-54, 57, and 60 were rejected under 35 U.S.C. § 103(c) as being unpatentable over U.S. Patent Application Publication No. 2002/0072993 (Sandus et al.) in further view of U.S. Patent Application Publication No. 2002/0026380 (Su).

Claims 2, 24, and 46 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Sandus and Su in view of U.S. Patent Application Publication No. 2003/0154135 (Covington et al.).

Claims 3, 25, and 49 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Sandus and Su in view of U.S. Patent Application Publication No. 2003/0083957 (Olefson et al.).

Claims 5-7, 27-29, 47, 48, and 50 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Sandus and Su in view of U.S. Patent Application Publication No. 2003/0033205 (Nowers et al.).

Claims 14, 15, 36, and 37 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Sandus and Su in view of U.S. Patent Application Publication No. 2005/0075940 (DeAngelis et al.).

Claims 16-18, 38-40, and 55-56 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Sandus and Su in view of U.S. Patent Application Publication No. 2003/0195818 (Howell et al.).

Claims 21, 22, 43, 44, 58, and 59 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Sandus and Su in view of U.S. Patent Application Publication No. 2003/0069832 (Czepluch et al.).

Applicants respectfully traverse these rejections. Without conceding the propriety of these rejections, independent Claims 1, 23, 45, and 60 have been amended to variously incorporate the subject matter of dependent Claims 4, 6, 26, 28, 45, and 47, in order to further distinguish the invention from the cited art. Theses dependent claims have been cancelled. Applicants submit that the cited art, whether taken alone, or in combination, fails to teach or suggest the combination of features presently recited in the claims.

Claim 1 now recites a method for a user to shop online in a three dimensional (3D) virtual reality (VR) setting. The method comprises receiving a request at a shopping server to view a virtual shopping location; displaying the virtual shopping location on a user computer in a 3D interactive simulation view via a web browser to emulate a real-life shopping experience for the user, the virtual shopping location having at least one store; obtaining a request to enter into a store of the virtual shopping location; displaying an actual store website of the store on the user computer in the same web browser, in response to the request to enter into the store, wherein

the actual store website of the store is linked to the virtual shopping location and wherein the actual store website is independently managed by the store and does not reside on the shopping server; receiving a request to insert the product into a virtual shopping cart, wherein the receiving of a request to insert includes storing the product into a shopping cart memory; and receiving a request to purchase products in the virtual shopping cart, wherein the products in the virtual shopping cart are from different stores of the virtual shopping location.

Nowers was relied upon in the Office Action to teach receiving a request to purchase products in the virtual shopping cart, wherein the products in the virtual shopping cart are from different stores of the virtual shopping location. However, the shopping cart of products taught by Nowers does not include products from multiple retailers, and, therefore, does not receive a request to purchase products from different stores. Rather, Nowers teaches shopping cart that combines products from different vendors, and distributes them through a single retail store. See Nowers, paragraphs 23 and 204. The vendors are not retailers, but rather suppliers for the retailers. As such, the vendors do not sell the products or offer them for sale to a user. Instead, the retailers offer the different vendor products for sale at a single store. Therefore, without conceding the propriety of the combination, Sandus, Su, and Nowers fail to teach or suggest at least receiving a request to purchase products in the virtual shopping cart, wherein the products in the virtual shopping cart are from different stores of the virtual shopping location. It is, therefore, submitted that at least Claim 1, and the claims dependent therefrom, are patentable over the prior art of record. Claims 23, 45, and 60 recite similar features as those presented in Claim 1, and are patentable for similar reasons as those discussed with respect to that claim.

For the foregoing reasons, Applicants submit that independent Claims 1, 23, 45 and 60 are allowable over the cited art of record. The dependent claims set forth additional features of Applicants' invention, and are patentable by virtue of their dependencies on allowable claims, as well as for the additional features they recite.

For example, dependent Claims 2 and 24 recite that the displaying of the virtual shopping location includes introducing the concierge to the user. The Office Action relies on Covington to teach this feature. However, the concierge taught by Covington is not introduced to the user at the virtual shopping location. Rather, Covington teaches a concierge that is real and is physically located at a real mall. Covington, paragraph 14. As such, without conceding the propriety of the combination, Sandus, Su, and Covington fail to teach or suggest at least that displaying the virtual shopping location includes introducing a concierge to the user. It is, therefore, submitted that Claims 2 and 24 are also patentable over the prior art of record.

Dependent Claims 16 and 38 recite that clickstream data of the user's action is stored within the 3D VR setting in a clickstream database. The Office Action relies on Howell to teach this feature. However, the "clickstream" data taught by Howell does not store data of the user's actions within the 3D VR setting in a clickstream database. Rather, Howell teaches keeping information relating to what products have been viewed, and uses this information to cross sell related products. Howell, paragraph 53. In contrast, Claims 16 and 38 recite that the clickstream data is of the user's action. As such, without conceding the propriety of the combination, Sandus, Su, and Howell fail to teach at least storing a clickstream data of the user's actions within the 3D VR setting in a clickstream database. It is, therefore, submitted that at least Claims 16, 38, and 55, and the claims depending therefrom, are patentable over the prior art of

record.

In view of the foregoing, reconsideration and allowance of this application is deemed to be in order and such action is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

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